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JUN 26 2012

FCC Mail Room

Undue burden 79.1 exemption

To Federal Commination Commission


We are writing in response to an FCC request sent to WOOD TV/WOTV4, a local channel in Grand Rapids, Michigan, concerning closed captioning for all the programs they air. We produce one of those programs, a sketch comedy/variety show called "You've Got To Be Kidding Me, America." We believe we should be exempt from the closed captioning rule because (1) we are a locally produced community theatre production and (2) we fall under the "undue burden" exemption.

We are a group of local actors, writers and crew people who enjoy putting together a local show that is entertaining, and we love making people laugh. We dedicate a chunk of our free time to do this show out of love, and we have a blast doing it. It's voluntary and we don't make any income from it. Many of us have backgrounds in local civic theatre and community TV, and we offer local college students studying film the opportunity to gain real, hands-on experience.

We are fortunate to have access to one of the best community TV studios in the country, WKTV, where we can freely shoot our show and improve our skills. We are truly a local community theatre production that would be unduly burdened by the cost of adding closed captioning to each of our episodes. We got two quotes for "per episode" closed captioning. One was \$435 and the other was \$250, and we just can't afford that. Currently, we are only able to raise enough funds for a "paid programming" spot at 1:35 AM late Friday nights/Saturday mornings on WOTV4.

We hope to continue learning and growing in our community and beyond; however, if we have to pay for closed captioning at this point, we won't be able to air on WOTV4, and we'd be taking a huge step backward in our efforts to expand and reach more and more people. We hope the FCC will understand our situation and grant us the exemption we're requesting.

Sincerely,



Larry Swanson, CEO

Its CEO

Five and Dime Productions

1-800-977-6678 (U.S.A. and Canada)  
301-738-8487 (Worldwide)  
**Fax:** 301-738-8488

**"Closed Captioning: It's the Law"**

**CPC - Home of e-Captioning**

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**Subject:** Fwd: captions for You Got To Be Kidding Me America

**From:** David Tette (fivendime87@gmail.com)

**To:** larswan@yahoo.com;

**Date:** Monday, June 18, 2012 6:49 PM

----- Forwarded message -----

**From:** **Emily Bell** <emily@captionmax.com>

**Date:** Mon, Jun 18, 2012 at 11:46 AM

**Subject:** captions for You Got To Be Kidding Me America

**To:** "fivendime87@gmail.com" <fivendime87@gmail.com>

Hi, David.

Thanks for looking into CaptionMax. For a series of half-hour programs, we can create closed captions for \$275 per episode. This includes script import if you have one or professional human transcription if you don't, caption timing and formatting, PreciseCheck, and export of an .scc caption data file.

What are the file specs that the TV station is asking for? And what software are you using to edit and export your videos? You might be able to incorporate the .scc captions yourself. Or if we do the encoding, I'd need to know more about the file type; not all video codecs support closed captioning.

**Subject:** service quote  
**From:** McLean Anderson (mclean@cpcweb.com)  
**To:** larswan@yahoo.com;  
**Cc:** service@cpcweb.com;  
**Date:** Monday, June 18, 2012 7:02 PM

Dave,

As requested, here is a quote for the closed captioning of your 30m show. For a 5 day turn around you are looking at \$260 for captioning and transcription. If the captions need to be embedded in the MP4 instead of in a stand-alone file that's an additional \$50. This is just an initial quote. The service manager, Matt, has final say on all work and can generate an official quote for you tomorrow when he arrives at 9AM EST.

Regards,

McLean Anderson

[mclean@cpcweb.com](mailto:mclean@cpcweb.com)

**Office hours: M-F 10AM – 6PM EST**